

CLEARY GOTTlieb STEEN & HAMILTON LLP

One Liberty Plaza  
New York, NY 10006-1470

T: +1 212 225 2000

F: +1 212 225 3999

clearygottlieb.com

WASHINGTON, D.C. • PARIS • BRUSSELS • LONDON • MOSCOW  
FRANKFURT • COLOGNE • ROME • MILAN • HONG KONG  
BEIJING • BUENOS AIRES • SÃO PAULO • ABU DHABI • SEOUL

D: +1 212 225 2333  
memcdonald@cgsh.com

STEVEN M. LOEB CRAIG B. BROD NICOLAS GRABAR DAVID E. BRODSKY RICHARD J. COOPER JEFFREY S. LEWIS PAUL J. SHIM STEVEN L. WILNER ANDRES DE LA CRUZ DAVID C. LOPEZ MICHAEL A. GERSTENZANG LEV L. DASSIN JORGE U. JUANTORENA MICHAEL D. WEINBERGER DAVID LEINWAND DIANA L. WOLLMAN JEFFREY A. ROSENTHAL MICHAEL D. DAYAN CARMINE D. BOCCUZZI, JR. JEFFREY D. KARPFF KIMBERLY BROWN BLACKLOW ROBERT J. RAYMOND FRANCISCO L. CESTERO FRANCESCA L. ODELL WILLIAM L. MCRAE JASON FACTOR JOON H. KIM MARGARET S. PEONIS LISA M. SCHWEITZER JUAN G. GIRÁLDEZ DUANE McLAUGHLIN BREON S. PEACE CHANTALE E. KORDULA	BENET J. O'REILLY ADAM E. FLEISHER SEAN A. O'NEAL GLENN P. MCGRORY MATTHEW P. SALERNO MICHAEL J. ALBANO VICTOR L. HOU ROGER A. COOPER AMY R. SHAPIRO JENNIFER KENNEDY PARK ELIZABETH LENAS LUKE A. BAREFOOT JONATHAN S. KOLODNER DANIEL LAN MEYER H. FEDIDA ADRIAN R. LEPSIC ELIZABETH VICENS ADAM J. BRENNEMAN ARID. MACKINNON JAMES E. LANGSTON JARED GERBER COLIN D. LLOYD COREY M. GOODMAN RISHI ZUTSHI JANE VANLARE DAVID H. HERRINGTON KIMBERLY R. SPOERRI AARON J. MEYERS DANIEL C. REYNOLDS AUDRY X. CASUSOL ABENA A. MAINOO HUGH C. CONROY, JR. JOSEPH LANZKRON	MAURICE R. GINDI KATHERINE R. REAVES RAHUL MUKHI ELANA S. BRONSON MANUEL SILVA KYLE A. HARRIS LINA BENSMAN ARON M. ZUCKERMAN KENNETH S. BLAZEJEWSKI MARK E. McDONALD F. JAMAL FULTON RESIDENT PARTNERS SANDRA M. ROCKS JUDITH KASSEL PENELOPEL CHRISTOPHOROU BOAZ S. MORAG MARY E. ALCOCK HEIDE H. ILGENFRITZ KATHLEEN M. EMBERGER ANDREW WEAVER HELENA K. GRANNIS JOHN V. HARRISON CAROLINE F. HAYDAY NEIL R. MARKEL LAURA BAGARELLA JONATHAN D.W. GIFFORD SUSANNA E. PARKER DAVID W.S. YUDIN RESIDENT COUNSEL LOUISE M. PARENT OF COUNSEL
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VIA ECF

October 22, 2021

The Honorable Lorna G. Schofield  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Manbro Energy Corp. v. Chatterjee Advisors, LLC, et al.*, No. 20-cv-3773 (LGS):  
Request to File Under Seal

Dear Judge Schofield:

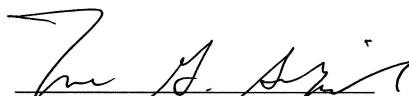
We respectfully write on behalf of Plaintiff Manbro Energy Corporation ("Plaintiff"), in accordance with Paragraph I.D.3 of Your Honor's Individual Rules, to request leave to file under seal: (1) Plaintiff's Response to Defendants' Letter Motion for Conference Regarding Defendants' Proposed Motion for Summary Judgment (ECF No. 142), and (2) Plaintiff's Response to Defendants' Letter Motion for Conference Regarding Defendants' Motion to Exclude Testimony (ECF No. 144) (collectively, the "Responses"). Parties and attorneys of record who should have access to the sealed document are listed in Appendix A.

Plaintiff makes this sealing request pursuant to Paragraph 11 of the Stipulation and Order of Confidentiality, dated October 21, 2020 (ECF No. 51) (the "Confidentiality Order"). Plaintiff's Responses reference Confidential Information or Discovery Material, as defined in the Confidentiality Order, including excerpts of deposition testimony and materials produced by Defendants in this case.

Pursuant to Paragraph I.D.3 of Your Honor's Individual Rules, Plaintiff notes that it has no interest in confidential treatment of the information contained in the Responses and, therefore, absent objection by Defendants would propose to file the Responses on the public docket without any redactions. Should Defendants object to public filing and/or propose redactions, Plaintiff will of course be guided by the Court.

By **October 29, 2021**, Defendants shall file a response to Plaintiff's sealing application. So Ordered.

Dated: October 25, 2021  
New York, New York

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

Respectfully Submitted,

/s/ Mark E. McDonald

Mark E. McDonald

cc: All Counsel of Record (via ECF)

**Appendix A – Parties and Attorneys of Record**

Parties

Manbro Energy Corporation

Chatterjee Advisors, LLC

Chatterjee Fund Management, LP

Chatterjee Management Company, d/b/a The Chatterjee Group

Purnendu Chatterjee

Cleary Gottlieb Stein & Hamilton, LLP

Joon H. Kim

Victor L. Hou

Rahul Mukhi

Mark E. McDonald

Gibson, Dunn & Crutcher LLP

Randy M. Mastro

Mark A. Kirsch

Avi Weitzman

Casey Kyung-Se Lee